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6 Attorneys for Debtors

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8 UNITED STATES BANKRUPTCY COURT  
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10 NORTHERN DISTRICT OF CALIFORNIA  
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12 IN RE: CASE No. 17-10828 WJL

13 FLOYD E. SQUIRES, III and CHAPTER 11  
14 BETTY J. SQUIRES,

15 Debtors. / SUPPLEMENTAL DECLARATION OF  
16 DAVID N. CHANDLER IN OPPOSITION  
17 TO MOTION TO STRIKE  
18

19 I, DAVID N. CHANDLER, declare and say:

20 1. If called as a witness, I am competent to testify to the  
21 within matters from my own knowledge.

22 2. I caused to be executed and filed a Declaration on April  
23 3, 2019 which erroneously stated that I had promptly notified Mr.  
24 Schultz as to the five properties for which all documents requested  
25 pertaining to same would be produced.

26 3. The same date, Mr. Schultz notified me that I had not, in  
27 fact, provided him with the list. I immediately reviewed my emails  
28 and discovered that I had prepared the email and sent it to Mr.  
Floyd for approval, but that I had not sent it along to Mr. Schultz  
as I had thought I had done.

4. Our computer system was infected with malware and  
completely went down on March 25<sup>th</sup>, the date which I had agreed to  
identify the properties. The email was not sent as I had intended

1 and believed it had. On April 3<sup>rd</sup>, I forwarded the email which I had  
2 sent to Mr. Floyd for approval to Mr. Schultz as I could not locate  
3 the one prepared to Mr. Schultz.

4 5. Regretfully, my Declaration of April 3, 2019 was in error  
5 as to that point and I apologize to Mr. Schultz. Mr. Schultz has  
6 the identity of the five properties and hopefully can move forward  
7 with production.

8 Executed under penalty of perjury this 4th day of April, 2019  
9 at Santa Rosa, California.

10 /s/David N. Chandler  
11 David N. Chandler  
12 Attorney for Debtors  
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